



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

March 18, 2008

Mr. Bruce Ramsey
Forest Plan Revision
Beaverhead-Deerlodge National Forest
420 Barrett Street
Dillon, MT 59725-3572

Re: CEQ # 20080051; Beaverhead-Deerlodge National
Forest Final Forest Plan Revision & EIS

Dear Mr. Ramsey:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the revised draft Forest Plan Revision and final Environmental Impact Statement (FEIS) and for the Beaverhead-Deerlodge National Forest in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to agency DEIS comments, and revisions made to the FEIS in response to our comments. We commend the Beaverhead-Deerlodge National Forest (BDNF) for their effort in reviewing and synthesizing a great amount of input and information during development of the final Forest Plan Revision and EIS. The EPA does not object to the BDNF's new preferred alternative, Alternative 6, although we still consider Alternative 3 to be the environmentally preferred alternative, since Alternative 3 would result in the greatest amount of watershed protection and restoration; highest level of fisheries and wildlife conservation and protection; increased limitations on motorized uses and reductions in road density to protect resources; and higher levels of protection for more pristine areas with unique resource values.

While we consider Alternative 3 to be environmentally preferred, we recognize that the BDNF has multiple use responsibilities and must consider many competing needs and balance many environmental, social, economic, and resource management trade-offs. The new preferred alternative (Alternative 6) also has many merits and desirable features, and was developed to balance the demand for diverse recreation opportunities; resource protection, and commodity outputs; emphasize aspen restoration; manage motorized and non-motorized uses to minimize user conflicts and protect resource values; and to develop a consistent and integrated aquatic

strategy to provide for protection for riparian areas, aquatic species, and clean water.

We are pleased that the Forest Plan includes direction to ensure that management actions avoid further degradation of impaired waters and promote water quality restoration; and that a Forestwide Aquatic Strategy has been developed to protect streams and riparian areas, restore water quality and watersheds, and conserve fish and other aquatic species. We also appreciate the additional information provided regarding the methodology used for identification of key restoration watersheds. We are disappointed, however, that more aggressive watershed restoration efforts are not being proposed, since the preferred alternative still only identifies 15 key watersheds for restoration during the 10 to 15 year planning period, while the FEIS indicates that there are 129 functioning-at-risk and 166 non-functioning stream reaches, 74 watersheds in a “poor” condition with low geomorphic, hydrologic, & biotic integrity on the BDNF, and 269 water quality impaired stream reaches within the analysis area (i.e., 303(d) listed waters). We are concerned that many impaired waters, degraded watersheds, and non-functioning streams will not be restored during the 10 to 15 year planning period. We encourage the BDNF to consider a more aggressive and comprehensive commitment to watershed restoration.

Also, since the BDNF is in the process of site-specific transportation planning we want to once again emphasize the need to reduce sediment delivery from roads, improve or remove road stream crossings, and close or decommission roads which cannot be adequately maintained. As you know roads modify natural drainage networks and accelerate erosional processes resulting in increased stream sedimentation, degradation of aquatic habitats, and altered channel morphology. Roads and motorized uses also fragment and degrade wildlife habitat, displace wildlife and change behavior, reduce reproductive success and security, and increase wildlife stress and mortality. Roads are also a major vector for spreading weeds. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities. We encourage road decommissioning and reductions in road density to improve watershed conditions and aquatic health in area streams, as well as to protect and enhance wildlife habitat and connectivity.

Finally, the FEIS states that monitoring is addressed in the Forest Plan (Chapter 5), but is not discussed separately in the EIS “because monitoring creates no environmental effects in and of itself.” We want to remind you that the CEQ’s NEPA regulations indicate that “a monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation” in the Record of Decision (40 CFR 1505.2(c)). Further, these rules state that “agencies may provide for monitoring to assure that their decisions are carried out and should do so in important cases, and upon request make available to the public the results of relevant monitoring” (40 CFR 1505.3). Accordingly we believe there should at least be a summary of the more important monitoring and adaptive management program elements in the Record of Decision.

The EPA appreciates the opportunity to review the Forest Plan Revision and provide comments during the NEPA process. If you have any questions regarding our comments please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or



in Helena at (406) 457-5022, or via e-mail at potts.stephen@epa.gov .

Thank you very much for your consideration.

Sincerely,

/s/ John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena